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**MEMO ENDORSED**

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October 28, 2021

**VIA ECF**

Hon. Valerie E. Caproni  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: Valentin et al v. Abitino's Pizza 49<sup>th</sup> Street Corp. et al  
CASE #: 1:21-cv-03251-VEC

Your Honor:

This office represents Plaintiff Bernabe Pablo Valentin ("Plaintiff") in the above referenced matter. I write to respectfully request an extension of time to file our Cheeks letter motion and settlement agreement.

Pursuant to the Court's order dated 09/28/2021 (Dkt. No. 23), the Court directed the Plaintiffs to file a Cheeks letter motion and settlement agreement by October 28, 2021. The parties have signed the settlement agreement; however, over a miscommunication the Defendants have not signed the Confessions of Judgement. As such, we respectfully request a seven day (7) extension through November 7, 2021 to submit the parties finalized agreement.

Additionally, I respectfully request an adjournment of the conference scheduled for October 29, 2021 at 10AM. In the alternative, I would be available for a telephonic conference since I am currently out of New York State attending to an unexpected personal matter. I apologize to the Court for any inconvenience in regard to this matter.

Respectfully submitted,


By: s/ Bryan D. Robinson  
Bryan D. Robinson, Esq.

Application GRANTED.

The parties' deadline to file the letter motion and settlement agreement is adjourned to **Monday, November 8, 2021**. The conference, currently scheduled for Friday, October 29, 2021 at 10:00 A.M., is adjourned to **Friday, November 12, 2021 at 3:30 P.M.** The parties only have to appear at the conference if no letter motion is filed by the November 8 deadline. The conference will be held in Courtroom 443 of the Thurgood Marshall U.S. Courthouse, 40 Foley Square, New York, New York 10007.

Absent emergency circumstances, requests for adjournment must be made at least 48 hours in advance of the deadline. *See* Rule 2(C) of the undersigned's Individual Practices in Civil Cases.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni".

Date: October 28, 2021

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE